



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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86 Chambers Street  
New York, NY 10007

June 15, 2020

BY ECF

Honorable Paul A. Engelmayer  
United States District Judge  
40 Foley Square  
New York, NY 10007

Re: *Reclaim the Records, et al. v. U.S. Department of Veterans Affairs*, 18 Civ. 8449 (PAE)

Dear Judge Engelmayer:

This Office represents the United States Department of Veterans Affairs (the "VA") in this Freedom of Information Act ("FOIA") case. We write pursuant to this Court's Order, *see* Dkt. No. 45, which instructed the parties to file a joint status update on the parties' discussions regarding the "cut-off date" to be applied by the VA with respect to the "2010-Present" data from the BIRLS database. The Court has ordered the VA to produce to Plaintiff this subset of data by April 1, 2022. *See* Dkt. No. 39.

For this subset of data, the parties jointly propose that the VA apply a cut-off date of March 24, 2020, the same date as this Court's Opinion and Order, Dkt. No. 39. The parties respectfully request that the Court so-order this stipulation.

We thank the Court for its consideration of this submission.

Respectfully,

GEOFFREY S. BERMAN  
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cc: Counsel of record (via ECF)